

1 ROBERT W. FREEMAN  
Nevada Bar No. 3062  
2 [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
PRISCILLA L. O'BRIANT  
3 Nevada Bar No. 010171  
[Priscilla.OBriant@lewisbrisbois.com](mailto:Priscilla.OBriant@lewisbrisbois.com)  
4 JENNIFER A. TAYLOR  
Nevada Bar No. 6141  
5 [Jennifer.A.Taylor@lewisbrisbois.com](mailto:Jennifer.A.Taylor@lewisbrisbois.com)  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
6 6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
7 Telephone: (702) 893-3383  
Fax: (702) 893-3789  
8 *Attorneys for Defendant*  
USAA CASUALTY INSURANCE COMPANY

9  
10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 DINA BARELA, individually.

13 Plaintiff,

14 vs.

15 USAA CASUALTY INSURANCE  
16 COMPANY, DOES 1 through 20, ROE  
17 BUSINESS ENTITIES I through 20, inclusive  
jointly and severally,

18 Defendants.

CASE NO.: 2:21-cv-00084-RFB-NJK

**STIPULATION AND ORDER TO EXTEND  
STAY OF DISCOVERY PENDING THE  
OUTCOME OF PRIVATE MEDIATION**

**(First Request)**

19 ROBERT W. FREEMAN

20 COMES NOW, Plaintiff DINA BARELA ("Barela") and Defendant USAA  
21 CASUALTY INSURANCE COMPANY ("USAA-CIC"), by and through their respective counsel  
22 of record and hereby stipulate and make joint application (First Request) to extend the stay of  
23 discovery in this matter entered on October 19, 2021 until such time as the parties conclude a  
24 mediation to which the parties have agreed. (ECF No. 27) The mediation previously scheduled  
25 for November 17, 2021 has been moved to December 2, 2021.  
26  
27  
28

1           Good cause exists to continue the stay of discovery in this matter. Specifically, the parties  
 2 had previously scheduled mediation for November 17, 2021 with the Honorable Nancy Saitta,  
 3 which was the earliest timeframe all parties/counsel and the mediator could be available. However,  
 4 on the day of the mediation, hours prior to commencement, Plaintiff had to cancel and postpone the  
 5 mediation due to a sudden personal emergency. As a result, the parties agreed to continue the  
 6 November 17<sup>th</sup> scheduled mediation. Judge Saitta has rescheduled the mediation to December 2,  
 7 2021. As such this joint request is made to extend the stay of discovery until after the mediation on  
 8 December 2, 2021.

9           The stay of discovery will allow the parties to explore the possibility of settlement through  
 10 mediation without incurring the time and expense of ongoing discovery prior to the mediation.

11           Within 14 days after completion of the mediation, the parties will submit a Stipulation and  
 12 Order reflecting resolution of some or all of the claims and/or advise the Court that the parties were  
 13 unable to resolve the claims and will submit new discovery deadlines, including the rebuttal expert  
 14 deadlines, discovery cutoff deadline (providing ample time to complete written

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

discovery and depositions), deadline for filing dispositive motions and the deadline for filing the Joint Pretrial Order.

DATED this 19th day of November, 2021

DATED this 19th day of November, 2021

Attorneys for Plaintiff

Attorneys for Defendant

Approved for e-signature:

Approved for e-signature

/s/ Samantha A. Martin  
BENJAMIN P. CLOWARD, ESQ.  
Nevada Bar No. 11087  
SAMANTHA A. MARTIN, ESQ.  
Nevada Bar No. 12998  
RICHARD HARRIS LAW FIRM  
801 S. Fourth St.  
Las Vegas, NV 89101

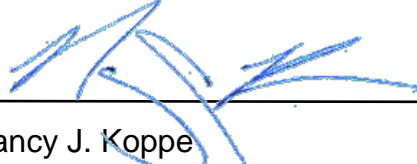
/s/ Jennifer A. Taylor  
ROBERT W. FREEMAN, Esq.  
Nevada Bar No. 3062  
PRISCILLA L. O'BRIANT, Esq.  
Nevada Bar No. 10171  
JENNIFER A. TAYLOR  
Nevada Bar No. 6141  
Lewis Brisbois Bisgaard & Smith, LLP  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118

**ORDER**

The parties must file a status report no later than December 16, 2021. Additionally, if the case does not settle at mediation, the parties must file a revised joint proposed discovery plan no later than December 16, 2021.

**IT IS SO ORDERED.**

Dated: November 22, 2021

  
Nancy J. Koppe  
United States Magistrate Judge